

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY )  
UTILITIES COMPANY FOR AN ADJUSTMENT OF ITS ) CASE NO.  
ELECTRIC RATES AND FOR CERTIFICATES ) 2016-00370  
OF PUBLIC CONVENIENCE AND NECESSITY )

ELECTRONIC APPLICATION OF LOUISVILLE GAS AND )  
ELECTRIC COMPANY FOR AN ADJUSTMENT OF ITS ) CASE NO.  
ELECTRIC AND GAS RATES AND FOR CERTIFICATES ) 2016-00371  
OF PUBLIC CONVENIENCE AND NECESSITY )

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION  
TO AT&T

AT&T, pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies in paper medium and an electronic version of the following information. The information requested herein is due on or before March 31, 2017. Responses to requests for information in paper medium shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

AT&T shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which AT&T fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, AT&T shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Direct Testimony of Mark Peters, pages 14-15. Page 14, lines 10-12, state that there is no justification for AT&T to indemnify Kentucky Utilities Company and Louisville Gas and Electric Company (jointly "Companies") for claims arising out of the joint negligence of AT&T and the Companies. Given that page 15, lines 4-6, includes language from a previous Commission order in which the Commission allows a utility to require indemnification in cases of joint negligence, explain the statement that there is no justification for indemnification language pertaining to joint negligence.

2. Refer to the Direct Testimony of Kevin Early, pages 5-6. Page 5, lines 20-21, includes language from the Companies' proposed Pole and Structure Attachment Charges tariff that written notice of each service drop would be required in the month following installation. Page 6, lines 5-10, discusses AT&T's contention that the proposed language would interfere with its ability to promptly serve its customers. Explain why a requirement to provide notice after an installation would interfere with AT&T's ability to provide service to its customers quickly.

3. Refer to the Direct Testimony of Daniel Rhinehart, page 13.

a. Confirm that AT&T's recommendation is that the annual wireless facility fee be \$7.25 instead of \$84.00. If this cannot be confirmed, state AT&T's recommendation.

b. State whether AT&T believes there should be two wireless facility fees, one for pole-top attachments and one for mid-pole attachments. If yes, explain how each annual fee should be calculated.



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DATED MAR 17 2017  
cc: All parties

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